



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

EMN:AH/SPN/PT/MKM

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 19, 2016

By Hand and ECF

The Honorable Raymond J. Dearie
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Zorana Danis
 United States v. Alfredo Hawit et al.
 United States v. Fabio Tordin
 United States v. Luis Bedoya
 United States v. Roger Huguet
 United States v. Miguel Trujillo
 Criminal Docket Nos. 15-240 (RJD), 15-252 (RJD),
 15-240 (RJD), 15-564 (RJD), 15-569, (RJD), 15-585 (RJD),
16-108 (RJD)

Dear Judge Dearie:

The government respectfully submits this letter in response to the letter motion of counsel for Buzzfeed News on June 23, 2016 seeking to unseal the transcripts of the guilty pleas entered by defendants Zorana Danis, Fabio Tordin, Luis Bedoya, Roger Huguet, Rafael Callejas, Alfredo Hawit, and Miguel Trujillo in the above-listed cases, and to require the public filing of these defendants' plea agreements. The transcripts of some of these defendants' guilty plea proceedings were never sealed (in the cases of Trujillo, Callejas and Hawit), so the government does not object to a motion for their unsealing. The government also does not object to the unsealing of the transcripts of Danis, Tordin, Bedoya, and Huguet's guilty plea proceedings, with limited redactions that the government has proposed to the Court, for reasons set forth in a separate submission filed yesterday under seal. The government opposes the public filing of these defendants' plea agreements, also for reasons

set forth in the same sealed submission. The government has conferred with counsel for all of these defendants, and they join in this request.

Respectfully submitted,

ROBERT L. CAPERS
United States Attorney
Eastern District of New York

By: _____/s/

Evan M. Norris
Amanda Hector
Samuel P. Nitze
M. Kristin Mace
Paul Tuchmann
Assistant U.S. Attorneys
718-254-7000